



July 21, 2020

VIA ECF

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The Honorable Katherine Polk Failla, U.S.D.J.
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Room 2103
New York, New York 10007

Re: Solange Troncoso v. Inventure Foods, Inc.
Case No. 1:19-cv-02735 (KPF) (KHP)
Submission of Confidentiality Protective Order for Review and Approval

Dear Judge Failla,

This firm represents defendant Inventure Foods, Inc., in the above-referenced action.

Pursuant to Rule 26(c)(1) of the Federal Rules of Civil Procedure, the parties have negotiated and agreed upon a protective order governing the disclosure of confidential materials in this litigation (the "Confidentiality Protective Order"). An executed copy of the Confidentiality Protective Order is attached as Exhibit "A" to this letter for the Court's review and approval.

Please feel free to contact me if the Court has any questions concerning the above.

Respectfully,

COZEN O'CONNOR

/s/ Richard Fama

BY: Richard Fama

cc: Lee Litigation Group, C.K. Lee (via ECF)

Attachment.